

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**GENESIS ALTERNATIVE FINANCE IV LLC,**

Plaintiff,

v.

Case No: 21-11351

Hon: Sean F. Cox

**SOUTHEAST MICHIGAN SURGICAL HOSPITAL, LLC  
D/B/A INSIGHT SURGICAL HOSPITAL,  
ALLIANCE ANESTHESIA PLLC,  
MICHIGAN SURGICAL HOSPITAL, AND  
JAWAD A. SHAH, M.D., P.C.**

Defendants.

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KASSEM DAKHLALLAH (P70842)  
**HAMMOUD, DAKHLALLAH &  
ASSOCIATES, PLLC**  
Attorney for Plaintiff  
6050 Greenfield Rd, Ste 201  
Dearborn, MI 48126  
(313) 551-3038  
kd@hdalawgroup.com

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**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE**

NOW COMES Plaintiff, Genesis Alternative Finance IV LLC ("Genesis"), by and through its attorneys, HAMMOUD, DAKHLALLAH & ASSOCIATES, PLLC, and for its voluntary dismissal of this lawsuit, hereby states as follows:

On June 9, 2021, Plaintiff filed its Complaint in the above-captioned matter. No Defendant has filed an answer or any other responsive pleading. Plaintiff has not previously dismissed any federal or state-court action based on or including the same claims brought forth in this case.

Pursuant to Fed R. Civ. P. Rule 41(a)(1)(A)(i), Plaintiff hereby gives notice that it voluntarily dismisses all claims in the above-captioned action, without prejudice, and without costs.

Plaintiff respectfully requests this Honorable Court enter an Order dismissing the case, without prejudice, and without costs.

Respectfully submitted:

/s/ Kassem M. Dakhallallah  
KASSEM DAKHLALLAH (P70842)  
**HAMMOUD, DAKHLALLAH &  
ASSOCIATES, PLLC**  
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Date: July 1, 2021

**CERTIFICATE OF SERVICE**

I certify that on July 1, 2021, I filed a copy of the foregoing with the Clerk of the Court using the electronic filing system which will send electronic notification of this filing to all parties. I further mailed a copy of the foregoing to each defendant's last known address.

/s/ Tarik Turfe  
Tarik Turfe,  
Associate Attorney